



May 22, 2015

**VIA ECF TO:**

The Honorable Brian M. Cogan  
United States District Court, Eastern District of New York  
225 Cadman Plaza South, 704S  
Brooklyn, NY 11201

**Re: Huebner v. Midland Credit Management, Case No. 14-cv-06046-BMC**

Dear Judge Cogan:

As you know we represent the Plaintiff in this action.

At the Discovery conference on held on May 7, 2015, Your Honor directed that the parties serve all document requests by May 24, 2015.

However, the foregoing directive is impracticable for the following reasons:

1. The Plaintiff has now filed a second amended complaint which has also added Midland Funding, LLC as a Defendant. Thus, it would be a waste of the parties' resources to serve discovery demands prior to issuance of a summons, service upon Midland Funding, LLC, and Plaintiff's receipt of an answer from the Defendants.
2. Additionally, May 24, 2015 is a Sunday, May 25, 2015 is Memorial Day, and May 24, 2015 and May 25, 2015 fall on the Jewish Holiday of Shavuot, wherein the offices of Plaintiff's attorneys are closed.

Due to the foregoing Plaintiff is requesting that the time to serve discovery demands be extended to 20 days after Defendants serve their answer upon Plaintiff.



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Moreover, we respectfully request that Your Honor allow the parties an opportunity to submit a revised Case Management Plan for the Court's review and approval.

Respectfully,

POLTORAK PC

/ s / Jacob T. Fogel

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Jacob T. Fogel  
Of Counsel

JF:yh